

**SABRINA P. SHROFF**  
ATTORNEY AT LAW

80 BROAD STREET  
NEW YORK, NEW YORK 10004  
TEL: (646) 763-1490

August 7, 2022


**BY ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSEMENT.**

The Court requests and recommends that Mr. Cuong Bang be transferred as soon as possible to the facility to which he is designated.

8/8/2022 SO ORDERED.



LEWIS J. LIMAN  
United States District Judge

**Re: *United States v. Bang*, 19 Cr. 213 (LJL)**

Hon. Judge Liman,

I write to request the Court's assistance in having Mr. Cuong Bang moved from the Metropolitan Detention Center ("MDC-Brooklyn") to a facility in or close to the Southern District of California.

Mr. Bang was sentenced on April 27, 2022. Four months later, and despite efforts by both defense and government counsel,<sup>1</sup> Mr. Bang remains at MDC-Brooklyn. Conditions at the MDC are *not* good. The facility is under almost constant lockdown. Clients inform us that they are able to order commissary but once a month (it used to be weekly) and even then their requests for food items go unfilled as many of the items are out of stock. The vending machines in the visiting room are not working and lawyers are unable to feed clients during legal visits. There is constant fighting on the unit/floors which result in cell checks and shuffling of units. Sentenced individuals are not receiving the benefit of any rehabilitative or treatment programs. Mr. Bang sits in MDC-Brooklyn waiting to be transferred.

I recognize that because Mr. Bang has been sentenced, the Court may be limited in its power to assist, but we write, nevertheless, to request the Court strongly recommend that the United States Marshal Service move Mr. Cuong Bang to the facility to which he is designated by the Bureau of Prisons, specifically to the extent possible to a facility in or close to the Southern District of California.

Respectfully submitted,

*/s/Sabrina P. Shroff*  
Counsel to Cuong Bang

SO ORDERED: \_\_\_\_\_

Hon. Lewis J. Liman  
Judge, Southern District of New York

---

<sup>1</sup> Assistant United States Attorney Hanft has e-mailed the USMS several times and was last told that Mr. Bang would be moved by end of July.